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GeoNet Ethanol, LLC

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

STOLT TANKERS B.V. (f/k/a STOLT-
NIELSEN TRANSPORTATION
GROUP B.V.),

Plaintiff,

-against-

GEONET ETHANOL, LLC,

Defendant.

08 CIV. 4382 (SAS)(JCF)

ECF CASE

**NOTICE OF MOTION TO VACATE WRIT
OF MARITIME ATTACHMENT**

PLEASE TAKE NOTICE that, upon the accompanying Declarations of J. Brent Baker and Ted G. Semaya, each dated June 18, 2008, the exhibits attached thereto, and upon the accompanying memorandum of law, Defendant Geonet Ethanol, LLC will move this Court at the United States Courthouse, Courtroom 15C, 500 Pearl Street, New York, New York, on July 3, 2008, at 10:00 a.m., or as soon thereafter as counsel can be heard, for an order, pursuant to Rule E(4)(f) of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure, (i) vacating the writ of maritime attachment issued in this case pursuant to Rule B(1) and

Rule C of the Supplemental Rules, or alternatively (ii) directing limited jurisdictional discovery relating to the extent to which Plaintiff Stolt Tankers B.V. may be found in the Southern District of Texas, together with such other, further and different relief as the Court may deem to be just, proper and equitable in the premises.

Dated: New York, New York
June 18, 2008

EATON & VAN WINKLE LLP

By: /s/ Ted G. Semaya

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